

April 24, 2025

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Hon. Jesse M. Furman
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Re: Checkmate.com Inc. v. Arjun Vasan, Case No. 25-cv-03181-JMF - Response to Defendant's Request for Extension

Dear Judge Furman,

I write on behalf of Checkmate.com, Inc. ("Checkmate") in opposition to the recent letter from *pro se* Defendant Arjun Vasan requesting a 14-day extension of time to file a responsive pleading in this matter, as well as to provide your Honor with additional context regarding the timeline of this dispute. Mr. Vasan's proposed two-week extension is entirely unnecessary given the amount of time that he has been on notice of the Complaint filed against him in New York State Court.

Last week, Mr. Vasan decided (without conferring with counsel for Plaintiff) to remove this case from New York State Court, where it has been pending since Checkmate filed its Complaint on February 14, 2025. Despite having received a copy of the initial pleadings in this case as early as March 4, Mr. Vasan has apparently made no attempt to secure counsel, and did not file any response or even make an appearance in the state court matter until purportedly filing his notice of removal on April 12th (although the removal filing was docketed on April 17th).

Granting Mr. Vasan an additional two weeks here would mean that he will have had nearly two months after initial service of the Complaint to respond. While we are aware that Mr. Vasan now appears to be challenging the adequacy of service of process against him, the truth is that Mr. Vasan was sending letters referencing the Complaint and threatening sanctions against counsel for Checkmate only a few days after the Complaint was (properly) served on him in early March.

While Plaintiff reserves the right to respond to Mr. Vasan's inadequate service of process arguments at a later date when those arguments are properly presented, two months to file a responsive pleading seems excessive given 1) the relatively short length of the Complaint 2) the fact that a Defendant would typically only receive 21 days to respond in a normal case and 3) Mr.

Vasan's repeated (and inexplicable) delays in this case. As a result, Checkmate respectfully asks that such request be denied, or that Defendant's deadline to respond to the Complaint be extended by a shorter and more appropriate length of time.

Checkmate reserves all rights and waives none.

Respectfully,

/s/ Thomas A. Warns

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